



AMERICAN PETROLEUM INSTITUTE

**Stephen E. Comstock**

Director, Tax and Accounting Policy

1220 L Street, NW  
Washington, DC 20005-4070  
Telephone (202) 682-8455  
Fax (202) 682-8408  
Email comstocks@api.org  
www.api.org

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**Via Electronic Filing**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: WP Docket No. 07-100, PS Docket No. 06-229 and WT Docket No. 06-150

Dear Ms. Dortch:

The Telecommunications Subcommittee of the American Petroleum Institute ("API") submits this letter regarding implementing the National Public Safety Telecommunications Council's October 2013 4.9 GHz National Plan. The report examined public safety use of the band and recommended critical infrastructure industries (CII) use on a shared co-primary basis with public-safety agencies and frequency coordination in the band.

API is a national trade association representing more than 650 companies involved in all phases of the petroleum and natural gas industries, including exploration, production, refining, marketing and transportation of petroleum, petroleum products and natural gas. Among its many activities, API acts on behalf of its members before federal and state regulatory agencies. The API Telecommunications Subcommittee evaluates and develops responses to state and federal proposals affecting telecommunications facilities used in the oil and gas industries. API is supported and sustained by companies that make use of a wide variety of wireline, wireless and satellite communications services on both a private and commercial basis.

API supports the 4.9 GHz National Plan. It includes frequency coordination to help minimize interference, bandwidth limits to increase spectral efficiency, provisions for new airborne and robotic applications to enhance incident response and opportunities for spectrum access by critical infrastructure. Allowing CII to share 4.9 GHz spectrum with public safety would provide an efficient use of the spectrum and would provide for a migration point for those applications currently grandfathered in the 3.65 GHz band. Broader primary access will foster a more responsive, robust, and economically competitive equipment marketplace.

API believes that the time has come for the FCC to implement NPSTC's plan.

Respectfully submitted,

Stephen Comstock